In instances where there is a significant financial interest (SFI), or relationship with an outside Entity that might bias judgment in research projects or oversight of graduate students’ research, the following management plan will help to address any existing or perceived biases.

**Interactions with Students and Other University Personnel:** Potential financial conflicts of interest may occur in any relationship when there is a real or perceived imbalance in power or influence between a mentor, advisor, or supervisor and a student, trainee, or junior colleague, and the potential for significant financial benefit to the more powerful individual. The highest level of protection must be sought for the student researcher and their participation in research activity with the Entity cannot prevent or inhibit the student Researcher from meeting the applicable degree requirements. Such involvement may require a modification of the COI management plan to appropriately manage student activity. The faculty member is responsible for ensuring that all students, fellows, trainees & visiting scientists engaged in research under their supervision are notified of their relationship with the external Entity, the existence of this management plan, and the names of contacts to notify with any concerns.

**Financial & Physical Resources:** A employee/researcher may not be directly involved in making decisions involving financial transactions between UNCG and the Entity using funding under their control. Any such contractual arrangements are to be delegated to an impartial party, who is not under the researcher’s supervision or control, such as a department chair, dean, or their designee. Use of university facilities or services by the Entity must be in compliance with all relevant university policies pertaining to use by external parties. Arrangements for these must be made through the department chair or dean and may require a written agreement. This includes use of computers, laboratory equipment, and supplies under the employee’s control.

**Publications:** A faculty member’s relationship with any external Entity may not place restrictions on any scholarly, research activity, including the ability to receive, analyze, or interpret data and to publish. Investigators and all researchers must disclose the relationship with the external Entity in publications and academic presentations where appropriate.

**Definitions:**

Entity: Entity means any domestic or foreign, public or private, organization (excluding a Federal agency) from which an EHRA designated employee (in addition to their spouse and dependent children) receives remuneration or in which any person has an ownership or equity interest.

Significant Financial Interest(SFI): SFI exists if the value of any remuneration received from the Entity in the twelve months preceding the disclosure and the value of any equity interest in the Entity as of the date of disclosure, when aggregated, exceeds $5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Discloser Name: Title/Rank

Department:

Campus Address:

Email Address:

|  |
| --- |
| Background Information: |
| Describe the Entity and the nature of your current relationship with the Entity (e.g., equity holder or other relationship for which you receive remuneration), include the current value of your interest in the Entity, including percentage of ownership (estimate if necessary), and all salaries or other remuneration received by you from this Entity.  Entity name:  Street:  City State: Zip:   * Describe the anticipated relationship of the Entity to the university. * What are your primary activities with the Entity? * Describe the time commitment to the Entity. * Describe any financial transactions required between UNCG and the Entity. Also, provide information on the Individual responsible for financial oversight below. * Are any current or former students engaged with this entity? If so describe how university work is being kept separate from entity work. * If you have ownership, (or any percentage of ownership) of the entity this may compete with your role as a University employee. If this is the case, we need clarity in detail explaining the differentiation between your roles. |
| Research relationships: |
| Describe how your UNCG research and other activities may relate or appear related to Entity activities described above.  Please attach a list of current and pending sponsored projects to this Plan and highlight those projects which may relate or appear to relate to the Entity activities. |
| Involvement and Interaction of Other University Personnel: |
| Describe how the disclosure of the existence of the potential conflict of interest to all personnel in your laboratory will take place.  The information provided should include explanations of:   * Investigator’s relationship with the Entity, and * Rights of students and staff to bring concerns about the effect of the Investigator’s relationship with the Entity on their work, studies, or progress towards degree to the Dean, their designee, or the COI Committee. |
| |  | | --- | | Relationship of students with external entity: | | Will students, trainees, and/or other university employees be involved in research or other projects with the external entity?  ☐ Yes ☐ No | | If yes, please describe that nature of the interaction with students and other personnel, including supervisory responsibilities, graduate students and employment of students by the Entity named above. Describe your role in student/employee supervision of activities related to this company. | | Duty of Candor: | | Students, trainees, and other university employees must be fully informed about source of funding, the nature of the faculty member’s or researcher’s personal interest or involvement, and, if relevant, any agreements concerning data collection, copyright, or patent protection arising from the research.  Please describe here how this will be accomplished:  (sample notification located at the end of document) | | Management Strategies: | | **Check all those that apply:**  ☐ Conduct annual meetings with members of my research group (students and staff) to explain the potential or actual financial conflict of interest and communicate the details of the management plan provisions related to efforts with the external Entity.  ☐ Meet with any new employee/student to convey this information.  ☐ Ensure these meetings are followed with a written summary of the information for each student or staff member participating in work related to the entity in which I have a vested interest.  ☐ Ensure that students meet with their graduate program chair, department head or institute director, and associate dean, & then sign voluntary agreement to participate in the activity.  ☐ Ensure that oversight of students, staff or key personnel on project with Entity named above is not the sole responsibility of the faculty member/researcher who has vested interest with the Entity.  Additional oversight will be provided by higher level academic administrator.  (Provide name, rank, department below): | | Co-advisor/Academic administrator of equal or greater rank: | | **(Provide name, rank, department):**  Co-advisor/Academic Administrator:  Department:  Email Address:  Telephone: | |
| Financial & Physical Resources: |
| Discuss the potential use of UNCG facilities, lab space, equipment and/or other resources by the Entity. Describe in detail any special privileges the Entity may have related to UNCG resources or activities, including University owned space/lab. If so describe how University duties is being kept separate from entity duties.   * Is the disclosure due to involvement in the formation of a university start-up?   + Who are the founders of the start-up?   + What is the intellectual property on which the start-up is based?   + Where is this university start-up located? * Is this University startup located on UNCG’s campus? ☐ Yes ☐ No * If yes, describe how your work with the startup is kept separate from your university responsibilities. * Do your UNCG activities require use of Entity proprietary materials or information?   *If so, please explain.*  Describe who will provide financial oversight for any financial transactions between UNCG and the Entity:  Individual responsible for financial oversight:  Department:  Email Address:  Telephone: |
| Publication Issues: |
| Discuss any publication delays or restrictions:   * Will the results of the research be provided to the Entity prior to becoming publiclly available (e.g. through a journal, on a website, or presented at an open meeting)?   *If so, please explain.*   * Are there any restrictions on UNCG’s or the investigator’s right to make the results publically available (published), or in ways that deviate from UNCG standard publication policy?   *If so, please explain.* |
| Public Disclosure Statement   * Provide a written statement describing the separation between the entity and the university that can be utilized for media purposes. |
| Additional Actions to Manage or Reduce Potential Conflicts:   * Describe in detail any additional Management Strategies that will be utilized to mitigate the Financial COI and explain how these oversight mechanisms are intended to address the potential conflict(s). |

**Acknowledgement**

By signing below, the employee attests that this Conflict of Interest Management Plan confirms their understanding of the manner in which the potential conflict of interest arising from their financial interest in the Entity and participation in the UNCG research or project will be handled. Additionally, the employee attests that:

* S/He agrees to comply with the management mechanisms described herein.
* The information presented in this document is complete, accurate, and true to the best of their knowledge.
* They will annually recertify all relevant disclosures or update them within 30 days of discovering or acquiring any new financial interests or changes in the reported interests/relationship(s).
* Appointments for visitors from the Entity will be discussed with and approved by their department head, and, if applicable, the lab or center where the research will be conducted.
* The Entity will not be given access to any UNCG facilities without the express approval of the department, lab or center head.
* Any financial relationships will be disclosed to the Chair of the COI committee for all relevant human subject work.
* Any material change in the nature of their relationship with the Entity, their activities on behalf of the Entity or the direction of their research as it relates to the Entity will be reported to their department head in advance or, if advance reporting is not practical or possible, immediately following the occurrence of the change.
* An annual report will update all information relevant to this management plan and will be submitted it to the appropriate department head and the ORI Director by October 1st of each year.
* Failure to comply with this Management Plan may have consequences.

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| Printed Name & Title |  |  |  |
|  |  | Date: |  |
| Signature |  |  |  |
|  |  |  |  |

**Administrative Review and Approval**

By signing below, the Department Head, Dean, Dean’s designee, or equivalent acknowledges:

* S/He has read and agrees to monitor the management mechanisms described herein, with annual reviews and updates to the plan as appropriate.
* The management plan is deemed to include mechanisms which are sufficient means to manage or eliminate financial conflicts of interest disclosed.

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| Printed Name & Title |  |  |  |
|  |  |  |  |
|  |  | Date: |  |
| Signature |  |  |  |

**Approved**

Reviewed & approved by the ORI Director

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| Printed Name & Title |  |  |  |
|  |  |  |  |
|  |  | Date: |  |
| Signature |  |  |  |